

**KEN THERRIEN**  
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Attorney for:  
LUIS ORTEGA ALCALA

**UNITED STATES DISTRICT COURT**  
**FOR THE EASTERN DISTRICT OF WASHINGTON**  
**(Honorable Stanley A. Bastian)**

|                          |   |   |
|--------------------------|---|---|
| UNITED STATE OF AMERICA, | ) | NO. 20-CR-6002-SAB-6                    |
| Plaintiff,               | ) |   |
| vs.                      | ) | MOTION AND DECLARATION FOR              |
|                          | ) | EXTENSION OF TIME TO FILE               |
| LUIS ORTEGA ALCALA,      | ) | OBJECTIONS AND SENTENCING               |
| Defendant.               | ) | MEMORANDUM                              |
|                          | ) | <b>August 12, 2022</b>                  |
|                          | ) | <b>Richland – Without Oral Argument</b> |

COMES NOW, Ken Therrien, the attorney for the defendant Luis Alcala Ortega and moves the court for an order extending time to file its objections to PSIR and sentencing memorandum. This motion is based upon the files and records herein and the Declaration of Counsel filed herewith.

**DECLARATION**

Ken Therrien upon oath deposes and states:

I am the Attorney for the defendant. I was appointed to this case on June 1, 2021 (ECF 322).

1 Mr. Ortega Alcala entered a plea of guilty on May 4, 2022, (ECF No.  
2 407). On June 28, 2022, I received a draft of the PSIR on Mr. Ortega  
3 Alcala's case. Counsel for Mr. Ortega Alcala is requesting an extension so  
4 he may review the PSIR in his native language and file objections to PSIR if  
5 necessary prior to the current deadline for doing so, currently set for July 13,  
6 2022, and Mr. Alcala-Ortega's Sentencing Memorandum, currently set for  
7 July 19, 2022.

8 Counsel has contacted local interpreters to review the PSIR with Mr.  
9 Ortega Alcala at the Yakima County Jail. However, all local interpreter's  
10 counsel contacted are not available at this time. In response, Counsel has  
11 attempted to, contact interpreters outside of Yakima County Area, and as of  
12 the date this motion has yet to receive a response.

13 Additional time is necessary for defense counsel to meet with Mr.  
14 Ortega-Alcala and review the PSIR with him in preparation of his pending  
15 Sentencing Hearing. Counsel has contacted AUSA Stephanie Van Marter  
16 regarding the extension. AUSA Van Marter has no objections to this request.  
17 Counsel is requesting an extension to July 22, 2022.

18  
19 Dated this 13<sup>th</sup> day of July, 2022.  
20  
21

22 /s/ Ken Therrien

23 KEN THERRIEN, WSBA #20291  
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**CERTIFICATE OF SERVICE**

I hereby certify under penalty of perjury of the laws of the State of Washington that on July 13, 2022, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will send notification of such filing to the following:

- Stephanie Van Marter, Assistant United States Attorney

s/ Ken Therrien

KEN THERRIEN, WSBA #20291

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